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13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF ARIZONA**

15 CASE NO.: 4:23-cv-00233- TUC-CKJ
16 (MAA)

17 State of Arizona, *ex rel.* Kristin K. Mayes,
18 Attorney General, *et al.*,

19 Plaintiffs,

20 v.

21 Michael D. Lansky, L.L.C., dba Avid
22 Telecom, *et al.*,

23 Defendants.

**DECLARATION OF SARAH
PELTON IN SUPPORT OF THE
STATE OF ARIZONA, *EX REL.*
KRISTIN K. MAYES, ATTORNEY
GENERAL’S MOTION TO
DETERMINE THE SUFFICIENCY
OF DEFENDANTS’ ANSWERS AND
OBJECTIONS TO PLAINTIFFS’
FIRST REQUESTS FOR
ADMISSION**

24 1. I am an Assistant Attorney General in the Civil Litigation Division at the
25 Arizona Attorney General’s Office, counsel of record for Plaintiff State of Arizona, *ex rel.*
26 Kristin K. Mayes, and a lead state for the State Plaintiffs (“Plaintiffs”). I have personal
27 knowledge of the facts set forth herein. If called as a witness, I could and would
28 competently testify to the matters stated herein.

2. I submit this declaration in support of Plaintiffs’ Motion to Determine the
Sufficiency of Defendants’ Avid Telecom, Michael Lansky, and Stacey S. Reeves

1 (“Defendants”), Answers and Objections to Plaintiffs’ First Set of Requests for Admission
2 (the “Motion”).

3 3. On or around August 20, 2025, Plaintiffs served their First Set of Requests
4 for Admission on each Defendant (the “Requests”). Attached hereto as **Exhibit A** is a true
5 and correct copy of Plaintiffs’ Requests.

6 4. Pursuant to Rule 36(a)(3) of the Federal Rules of Civil Procedure,
7 Defendants were required to respond to Plaintiffs’ Requests within 30-days after being
8 served. This would have made September 19, 2025 the deadline for Defendants to respond
9 to Plaintiffs’ Requests.

10 5. On or around September 19, 2025, defense counsel emailed Plaintiffs
11 requesting an extension to respond to September 23, 2025. Plaintiffs’ counsel stipulated to
12 the extension. Attached hereto as **Exhibit B** is a true and correct copy of the stipulation.

13 6. Defendants did not provide any responses on the stipulated deadline.

14 7. Defendants provided their responses via email on September 24, 2025.
15 Defendant Reeves’ initial copy contained attorney work product and was provided again
16 later that day. A true and correct copy of defense counsel’s email is attached as **Exhibit C**
17 and each Defendants’ first responses are attached hereto as **Exhibit D, Exhibit E, and**
18 **Exhibit F.**

19 8. On or around October 17, 2025, Plaintiffs sent an email to defense counsel
20 outlining the errors in each Defendants’ responses and requested a meet and confer. A true
21 and correct copy of Plaintiffs’ email is attached hereto as **Exhibit G.**

22 9. Defense counsel did not respond to Plaintiffs’ October 17, 2025
23 correspondence.

24 10. On or around November 24, 2025, the Court held a discovery status
25 conference, where defense counsel Greg Taylor repeatedly asserted that supplemental
26 Responses had been produced for all Defendants.

27 11. On or around November 25, 2025, defense counsel emailed Plaintiffs
28 discussing Defendants’ “supplemental” Responses and asked what “other problems”

1 Plaintiffs had with Defendants' Responses. A true and correct copy of defense counsel's
2 email is attached hereto as **Exhibit H**.

3 12. On or around the same day, November 25, 2025, Plaintiffs responded,
4 explaining that Plaintiffs were only in receipt of replacement responses from Defendant
5 Reeves and attached the October 17, 2025 meet and confer email detailing Plaintiffs'
6 concerns with Defendants' Responses. A true and correct copy of Plaintiffs' email is
7 attached hereto as **Exhibit I**.

8 13. On or around November 25, 2025, defense counsel responded, again stating
9 that the initial responses served on September 24, 2025, were "supplemented RFAs." A
10 true and correct copy of defense counsel's email is attached hereto as **Exhibit J**.

11 14. On or around November 26, 2025, Plaintiffs responded, stating their
12 understanding that the production served on September 24, 2025 was Defendants' initial
13 production and not a supplemented production, and that Plaintiffs had not received any
14 supplemented responses from any Defendant since the initial September 24 production. A
15 true and correct copy of Plaintiffs' email is attached hereto as **Exhibit K**.

16 15. On or around the same day, November 26, 2025, defense counsel responded,
17 attaching Responses for Defendant Reeves post-dated to October 23, 2025, and explaining
18 that it "may or may not have been mailed to the AGs previously; I'll presume the wrong
19 files were attached originally." The Responses were named "Reeves RFA Responses
20 (Final)[Corrected 10-23-2025][4]." Defense counsel stated that supplemented versions of
21 Defendant Lansky's and Defendant Avid Telecom's Responses would be sent "shortly." A
22 true and correct copy of defense counsel's email and Defendant Reeves' attached
23 Responses are attached hereto as **Exhibit L** and **Exhibit M**.

24 16. On November 26, 2025, defense counsel separately emailed Plaintiffs,
25 falsely claiming that the October 17, 2025 meet and confer email "advise[d] of deficiencies
26 in the Reeves responses only", and sent another version of supplemented responses for
27 Defendant Reeves on November 26, 2025 that contained attorney work product. A true and
28 correct copy of defense counsel's email is attached hereto as **Exhibit N**.

17. On or about December 1, 2025, Plaintiffs responded and assured defense counsel that the meet and confer email highlighted deficiencies in all Defendants' Responses, not just Defendant Reeves. A true and correct copy of Plaintiffs' email is attached hereto as **Exhibit O**.

18. Later that day, on December 1, 2025, defense counsel served deficient supplemented Responses for Defendant Reeves with no attorney work product. A true and correct copy of Reeves' supplemented Responses are attached hereto as **Exhibit P**.

19. Plaintiffs have attempted to meet and confer on this issue to no avail. Thus, Plaintiffs had no choice but to draft and file the Motion.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 5, 2025 at Phoenix, Arizona.

/s/ Sarah Pelton
Sarah Pelton (AZ State Bar No. 039633)
Counsel for Plaintiff State of Arizona

CERTIFICATE OF SERVICE

I hereby certify that on December 5, 2025, I caused the foregoing
**DECLARATION OF SARAH PELTON IN SUPPORT OF THE STATE OF
ARIZONA, EX REL. KRISTIN K. MAYES, ATTORNEY GENERAL'S
MOTION TO DETERMINE THE SUFFICIENCY OF DEFENDANTS'
ANSWERS AND OBJECTIONS TO PLAINTIFFS' FIRST REQUESTS FOR
ADMISSION** to be filed and served electronically via the Court's CM/ECF system
upon counsel of record.

/s/ Sarah Pelton
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